



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

SEP 17 1997

Martin J. Maddaloni, Treasurer
United Association Political Education
Committee
901 Massachusetts Avenue NW
Washington, DC 20001

Identification Number: C00012476

Reference: June Monthly (5/1/97-5/31/97) and August Monthly (7/1/97-7/31/97)
Reports

Dear Mr. Maddaloni:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses receipts from organizations that are not registered with the Commission. 2 U.S.C. §441b prohibits the receipt of funds from national banks, corporations, and labor organizations. Under 11 CFR §102.6, however, certain entities may serve as collecting agents for the purpose of transmitting contributions to a separate segregated fund. A collecting agent may be, but is not limited to, a committee which is affiliated with the separate segregated fund; the connected organization; or a local, national, or international union.

Funds received from a collecting agent are to be attributed to the original contributors and should be disclosed according to the requirements of 11 CFR §104.3(a). If the amounts in question were contributed by individuals and transmitted to your committee by a collecting agent, the activity should be included on Line 11(a)(i) of the Detailed Summary Page. Any contribution from an individual exceeding \$200 in the aggregate during the calendar year should be itemized on a supporting Schedule A. Collecting agents need not be identified on your report.

If the contributions in question were incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you

have received funds from entities which were not serving as collecting agents, you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to the donors in accordance with 11 CFR §103.3(b). In the best interest of your committee, all transfers-out and refunds should be made within thirty days of the treasurer's receipt of the impermissible funds. In order to protect the donor's interests, the Commission recommends that you inform the possible involuntary contributors in writing to provide the donors with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew J. Dodson". The signature is fluid and cursive, with the first name "Andrew" and last name "Dodson" clearly distinguishable.

Andrew J. Dodson
Senior Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page	PAGE	OF
	1	1
FOR LINE NUMBER 12		

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)
United Association Political Education
Committee

FEC ID No. C00012476

<p>A. Full Name, Mailing Address and ZIP Code Plumbers Local 59 Political Action Committee 19 Knollcrest Drive, Ste A Cincinnati, OH 45237</p> <p>Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): FEC# C00242024</p>	<p>Name of Employer Transfer from Affiliated committee</p> <p>Occupation N/A</p> <p>Aggregate Year-To-Date > \$ 2,000.00</p>	<p>Date (month, day, year) 5/30/97</p>	<p>Amount of Each Receipt this Period 2,000.00</p>
<p>B. Full Name, Mailing Address and ZIP Code Plumbers & Pipefitters Local 447 PAC 3841 Newman Court Sacramento, CA 95819</p> <p>Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): FEC# C00320218</p>	<p>Name of Employer Transfer from Affiliated Committee</p> <p>Occupation N/A</p> <p>Aggregate Year-To-Date > \$ 5,000.00</p>	<p>Date (month, day, year) 5/30/97</p>	<p>Amount of Each Receipt this Period 5,000.00</p>
<p>C. Full Name, Mailing Address and ZIP Code Plumbers & Pipefitters Local 486 PAC 7630 Philadelphia Road Baltimore, MD 21237</p> <p>Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): FEC# C00228585</p>	<p>Name of Employer Transfer from Affiliated Committee</p> <p>Occupation N/A</p> <p>Aggregate Year-To-Date > \$ 10,000.00</p>	<p>Date (month, day, year) 5/30/97</p>	<p>Amount of Each Receipt this Period 10,000.00</p>
<p>D. Full Name, Mailing Address and ZIP Code Pipe Fitters Local No. 522 Political Action Fund 1317 Berry Boulevard Louisville, KY 40215</p> <p>Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): FEC# C00163170</p>	<p>Name of Employer Transfer from Affiliated committee</p> <p>Occupation N/A</p> <p>Aggregate Year-To-Date > \$ 2,500.00</p>	<p>Date (month, day, year) 5/30/97</p>	<p>Amount of Each Receipt this Period 2,500.00</p>
<p>E. Full Name, Mailing Address and ZIP Code Plumbers & Pipefitters Local 816 PAC 1300 West Thomas Street Day City, MI 48705</p> <p>Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify): FEC# C00235101</p>	<p>Name of Employer Transfer from Affiliated Committee</p> <p>Occupation N/A</p> <p>Aggregate Year-To-Date > \$ 3,000.00</p>	<p>Date (month, day, year) 5/30/97</p>	<p>Amount of Each Receipt this Period 3,000.00</p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-To-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>G. Full Name, Mailing Address and ZIP Code</p> <p>Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-To-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
SUBTOTAL of Receipts This Page (optional)			22,500.00
TOTAL This Period (last page this line number only)			22,500.00